

EXHIBIT 2

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

FUSION ELITE ALL STARS et al.,

v.
Plaintiffs,

VARSITY BRANDS, LLC et al.,

Defendants.

Civ. Action No. 2:20-cv-2600

**RESPONSES OF DEFENDANTS VARSITY BRANDS, LLC, VARSITY SPIRIT, LLC,
AND VARSITY SPIRIT FASHION & SUPPLIES, LLC TO PLAINTIFFS' FIRST SET
OF INTERROGATORIES**

Defendants Varsity Brands, LLC; Varsity Spirit, LLC; and Varsity Spirit Fashion & Supplies, LLC (“Varsity”) hereby respond to Plaintiffs’ First Request for Production of Documents.

Term	Percentage
GMOs	100%
Organic	85%
Natural	75%
Artificial	100%
Organic	100%
Natural	100%
Artificial	100%
Organic	100%
Natural	100%
Artificial	100%

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A series of 15 horizontal black bars of varying lengths, arranged vertically from top to bottom. The bars are of different widths, with some being very long and others very short. They are all set against a white background.

INTERROGATORY NO. 9: Identify all Person(s) responsible for negotiating, drafting, implementing, and approving any Contracts on behalf of Varsity with: (a) any venues where All Star Events, Championships, or Championship Qualifiers are held; (b) broadcasters of All Star Events, Championships, or Championship Qualifiers; (c) third-party merchandisers or retailers selling Apparel or other cheerleading-related merchandise at All Star Events; (d) any Sponsor of All Star Events, Championships, or Championship Qualifiers; (e) any entity involved in the sales of tickets for All Star Events, Championships, or Championship Qualifiers; and (f) any entity involved in Varsity's Stay to Play program. For each Person identified, Identify: (a) the venue, broadcaster, third-party merchandiser or retailer, Sponsor, or other entity with whom each Person negotiated and approved Contracts; (b) each Contract such Person(s) negotiated or approved; and

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(c) the role and responsibilities of each Person with respect to each Contract.

OBJECTIONS AND RESPONSE: Varsity objects to Interrogatory No. 9 as seeking irrelevant information, as overly broad, unduly burdensome, and disproportional to the needs of the case. Varsity further objects that Interrogatory No. 9 is actually six interrogatories per person identified, in that it asks about six distinct types of contracts and requests further information for each person identified. Varsity further objects that the terms “involved in” and “role and responsibilities” are vague and ambiguous and susceptible to multiple interpretations.

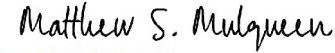
Subject to and without waiving those objections, Varsity responds that the individuals at Varsity with primary responsibility for negotiating “venues where All Star Events, Championships, or Championship Qualifiers are held” during the period January 1, 2015 to June 30, 2020 were Tres Letard and Brian Elza and, in the case of Walt Disney World, Melanie Berry. The individual at Varsity with primary responsibility for negotiating with “broadcasters of All Star Events, Championships, or Championship Qualifiers” during the period January 1, 2015 to June 30, 2020 was Nicole Lauchaire. The individuals at Varsity with primary responsibility for negotiating with “third-party merchandisers or retailers selling Apparel or other cheerleading-related merchandise at All Star Events” during the period January 1, 2015 to June 30, 2020 were John Newby and Chris Darby. The individuals at Varsity with primary responsibility for negotiating with entities “involved in the sales of tickets for All Star Events, Championships, or Championship Qualifiers” during the period January 1, 2015 to June 30, 2020 were John Newby and Chris Darby. The individuals at Varsity with primary responsibility for negotiating with entities “involved in Varsity’s Stay to Play program” during the period January 1, 2015 to June 30, 2020 were Tres Letard and Brian Elza.



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As to the objections:

Dated: December 28, 2020

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By: 
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* Admitted *pro hac vice*

*Attorneys for Defendants Varsity Brands, LLC,
Varsity Spirit, LLC, and Varsity Spirit Fashion &
Supplies, LLC*

As to the responses:

I, John Newby, am authorized to verify the above responses and declare under penalty of perjury that they are true and correct to the best of my knowledge, information and belief:

Dated: December 28, 2020

By: 